

In re Residential Capital, LLC, et al.
Chapter 11 Case No. 12-12020 (MG)

SENIOR LIEN STAY RELIEF QUESTIONNAIRE

This questionnaire is to be completed by any party (the "Requesting Party") requesting stay relief (each, a "Request") to foreclose on a mortgage or security interest (the "Senior Mortgage") on property (the "Property") in which Residential Capital, LLC, *et al.* (the "Debtors") hold a subordinate interest, and served on the parties listed below.

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Address of the Property that is the subject of the Request:

6425 Engel Drive, Hamburg, NY 14075

2. Name of the borrower under the Senior Mortgage:

John Wishman Jr. and Mary Wishman

3. Nature of the Debtors' interest in the Property (to be supported by a title or foreclosure report reflecting such liens or interests and attached to this Questionnaire):

Debtor is subordinate mortgage holder

4. Name and contact information of party that owns the Senior Mortgage (the "Senior Holder"):

Wilmington Savings Fund Society, FSB, doing business as Christiana Trust,

not in its individual capacity, but solely as trustee for BCAT 2015-13BTT

5. If the Requesting Party is different from the Senior Holder:

(a) Name and contact information of Requesting Party:

Selene Finance

9990 Richmond Ave, Suite 400 South, Houston, TX 77042

(b) Nature of Requesting Party's interest in the Property:

Selene Finance is servicer for Wilmington Savings Fund Society, FSB, et al.

(c) Capacity in which the Request is made (i.e., servicer, etc.):

Selene Finance is servicer for Wilmington Savings Fund Society, FSB, et al.

6. Description of any other known liens on the Property (including the holder of such liens):

Please see attached title search, Exhibit A, which identifies eight (8) additional
liens on the Property

7. Value of the Property on which the foreclosure bid is based (to be supported by an appraisal or broker price opinion (in each case conducted within the ninety (90) days preceding the date of the Questionnaire), or other documentation of value reasonably acceptable to the Debtors or other documentation of value reasonably acceptable to the Debtors and attached to this Questionnaire):

\$265,000.00 - Please see attached Exhibit B.

8. Total indebtedness attributable to the Senior Lien, including unpaid principal balance, outstanding corporate advances and legal fees (to be supported by documentation attached to this Questionnaire):

As of March 3, 2016, the total indebtedness is \$280,216.89.

Please see attached Exhibit C.

9. Description of the default under the Senior Lien (i.e., timing and nature of default, including date and amount of last payment, contractual payment amount outstanding, and length and amount of arrearage):

Loan is in default beginning with the January 1, 2011 payment; last payment
received was applied to December 1, 2010 payment; current payment
amount is \$1,955.65; loan is due for 62 payments, totaling \$121,250.30 in
payment arrearage.

10. Court in which the foreclosure action with respect to the Senior Mortgage is pending or in which the Requesting Party proposes to bring the action (and, if applicable, the case name and number, together with copies of any relevant documents filed in the First Lien Foreclosure Action):

Foreclosure action is pending in the Erie County Supreme Court under Index
No.: 603629/2011. Please see attached Exhibit D.

11. Description of any loss mitigation efforts undertaken by or on behalf of the Senior Holder with respect to the Senior Mortgage within the previous twelve (12) months:

11/2/2015 - Homeowner expressed interest in loss mitigation review
11/15/2015 - Letter sent out requesting documents to conduct review
12/4/2015 - Loss mitigation review terminated as documents requested were
not submitted.

I hereby certify that (a) I am authorized to submit this Request on behalf of the Requesting Party, and (b) the foregoing is true and correct to the best of my knowledge and belief.

Date: February 29, 2016

Name: Mark R. Knuckles, Esq.

Title: Managing Partner

